

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AWP, INC.,

Plaintiff,

v.

**SOUTHEASTERN TRAFFIC
SUPPLY, INC., STEPHEN
KOVACH, ROBERT PARRISH,
and ROSS SMITH,**

Defendants.

Case No.: 1:16-cv-01315-ELR

[PROPOSED] CONSENT ORDER FOR EXPEDITED DISCOVERY

Plaintiff AWP Incorporated (“AWP”) having moved for expedited discovery (ECF No. 4); all Defendants having responded in support of mutual expedited discovery with a modified timeline (ECF Nos. 13 and 14); the parties having attached proposed interrogatories, requests for production, and requests for admission (the “Discovery Requests”) to the Motion and respective Responses; it appearing that the requested discovery and relief requested in the Motion are reasonable; and for other good cause shown,

IT IS HEREBY ORDERED that:

1. Plaintiff’s Motion to Expedite Discovery is GRANTED as modified in this Order;

2. Plaintiff's Discovery Requests are deemed served on Defendants;
3. Defendants' Discovery Requests are deemed served on Plaintiff;
4. Written responses to all Discovery Requests and production of documents are due within 21 days after the date of this Order;
5. All parties shall make themselves available for deposition at a mutually agreeable time, with reasonable notice and upon agreement of the parties, within 60 days after the date of this Order.
6. All parties shall make the initial disclosures required by Federal Rule of Civil Procedure 26(a)(1) within 21 days of the date of this Order.
7. The Rule 26(f) Early Planning Conference shall be held by the parties before May 20, 2016 and the parties shall file a Joint Preliminary Report and Discovery Plan before June 3, 2016.

IT IS SO ORDERED, this _____ day of _____, 2016.

Judge Eleanor L. Ross